IN THE SUPREME COURT OF THE UNITED STATES

October Term, 1982

No. 82-5064

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SUPREME COURT, U.S.

BEATRICE L. ROBINSON, Appellant

v.

MARY BERG; GRETCHEN VAPNAR; COMMUNITY CRISIS CENTER, 600 MARGARET PLACE, ELGIN, ILLINOIS, an Inn, Appellees

ON APPEAL FROM THE SUPREME COURT OF ILLINOIS

JURISDICTIONAL STATEMENT

BEATRICE L. ROBINSON
Attorney for Appellant
P. O. Box 87414
Chicago, Illinois 60680

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IN THE SUPREME COURT OF THE UNITED STATES

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No.

BEATRICE L. ROBINSON, Appellant

v.

MARY BERG; GRETCHEN VAPNAR; COMMUNITY CRISIS CENTER, 600 MARGARET PLACE, ELGIN, ILLINOIS, an Inn, Appellees

ON APPEAL FROM THE SUPREME COURT OF ILLINOIS

JURISDICTIONAL STATEMENT

The Appellant submits herewith her Jurisdictional Statement as required by Rule 15 of the Rules of the Supreme Court of the United States.

OPINION BELOW

The decision sought to be reviewed was unconstitutionally and unlawfully entered in the Circuit Court for the Sixteenth Judicial Circuit, Kane County, Illinois, and affirmed by the Appellate Court of Illinois, Second Judicial District, and further affirmed by the Clerk of the Supreme Court of Illinois, March 31, 1982, and it is not reported.

GROUNDS OF JURISDICTION

The United States of America under and by virtue of 28 U.S.C. 1257(2), imposes upon the Supreme Court of the United States, by appeal, where is drawn in question the validity of a statute on the ground of its being repugnant to the constitution, treaties or laws of the United States, and the decision is in favor of its validity, in violation of the due process clauses of the Fifth and Fourteenth Amendments of the Constitution of the United States, as to the Appellant, wherein private property, personal property, etc.,are taken and appropriated for public use by a State without any form of compensation therefor, invalidating its statute, Chapter 14, Section 2, Illinois Revised Statutes, as amended, in disregard of the Appellant's right thereto. Winters v. People of State of N. Y., N.Y. 1948, 68 S. Ct. 665; Backus v. Fort St. Union Depot Co., Mich. 1898, 18 S. Ct. 445; Chicago, etc., R. Co. v. Chicago, Illinois,1897, 17 S. Ct. 581.

The judgment of the Supreme Court of Illinois was entered on March 31, 1982, and the Notice of Appeal was filed in the Circuit Court For The Sixteenth Judicial Circuit, Kane County Illinois on or about April 15, 1982. The jurisdict-

of this Court is conferred by 28 U.S.C. 1257(2).

8 Am. Jur. 2d Bailments, Secs. 31, 33; 18 Am. Jur. 2d Conversion Sec. 1, where the Bailor had right to immediate possession, the Bailee may not hold the property against the rights of the true owner. The Bailee's unqualified regusal constitutes a conversion of the property. Schaefer v. Washington Safety Deposit Co., 281 Ill. 43, 117 N.E. 781; Wetherell v. O'Brien, 140 Ill. 146, 29 N.E. 904.

QUESTIONS PRESENTED

1. Was it lawful for presiding Judge John Krause to dismiss this cause of action before allowing the Plaintiff time to present in competent evidence the depreciation price list of the converged household goods, etc., before the court? Did his abuse of judicial discretion violate the due process clauses of the Fifth and Fourteenth Amendments to the Constitution of the United States?

2. Was it lawful for the trial court to deny the Plaintiff a copy of the Report of Proceedings of the trial in forma pauperis?

STATEMENT OF THE CASE

The Appellant BEATRICE L. ROBINSON, brought this cause of action to recover monetary damages occasioned by the wilful, malicious, conspiratorial, unconstitutional, wrongful, unlawful breach of contract by Appellee MARY BERG, in her wilful, malicious, conspiratorial, unconstitutional, wrongful, unlawful conversion over the Appellant's household goods and personal properties, etc., together with Appellee GRETCHEN VAPNAR, during the time the Appellant's household goods and personal properties, etc., were in the private warehouse storage and safekeeping of Appellees' COMMUNITY CRISIS CENTER, 600 Marga-

ret Place, Elgin, Illinois, an Inn, for an indefinite period of time, pursuant to an agreement between said Appellee MARY BERG, and the Appellant BEATRICE L. ROBINSON, and without any form of notice written or published to the Appellant herein or knowledge thereof, despite the Appellant herein having remained in contact by telephone with said Appellees, failed and refused to advise the Appellant herein of their conversion over the Appellant's household goods and personal properties, etc., until subsequent to the Appellant herein having employed three (3) male adult movers, and rented a large nine-foot trailer in Chicago, Illinois, in which to move her household goods and personal properties, etc., from the private warehouse storage and safekeeping (Sering v. Shafroth, 137 Ill. 393, 27 N.E. 702) of Appellees' COMMUNITY CRISIS CENTER, at which time the Appellant herein was informed by Appellees MARY BERG; GRETCHEN VAPNAR, that her household goods and personal properties, etc., contained in the Inventory (Appendix "A" -Warehouse Receipt) of the Record on Appeal and the Jurisdictional Statement, had been sold.

Appellees herein wilfully, maliciously, unconstitutionally, wrongfully, unlawfully and knowingly converged over and sold the Appellant's household goods and personal properties, etc., without any form of notice of said sale thereof by written form of notice or by newspaper publication in serious violation and noncompliance with statutory requirements governing said sale and financial proceeds therefrom.

That said Appellees herein wilfully, maliciously, conspiratorially, unconstitutionally, wrongfully, and unlawfully sold the Appellant's household goods and personal properties, etc., and maintained and retained the total cash

money proceeds therefrom, exclusive of the storage fees chargeable to the Appellant herein, in excess of $30,000.00.

That said Appellees herein wilfully, maliciously, conspiratorially, criminally and permanently deprived the Appellant herein of her household goods and personal properties, etc., contained in the Inventory (Appendix "A" -Warehouse Receipt) of the Record on Appeal and made a part thereof, over which said Appellees herein acquired no legal rights thereto except the right and obligation of safekeeping of the Appellant's household goods and personal properties, etc., and legal storage fees therefor.

That pursuant to the said applicable, pertinent Illinois Law said Appellees are obligated under ministerial duty to pay the Appellant herein in monetary damages in liability for private warehouse storage of household goods and personal properties, etc., losses, which the Appellant herein left in the private warehouse storage and safekeeping of said Appellees' herein known as COMMUNITY CRISIS CENTER, an Inn, pursuant to an agreement with said Appellee MARY BERG, for an indefinite period of time.

That the cash depreciation value of the Appellant's household goods and personal properties, etc., exceeds the aggregate sum of $30,000.00, plus costs.

That said Appellees wilful, malicious, conspiratorial, unconstitutional, wrongful, criminal, unlawful conversion over the Appellant's household goods and personal properties, etc., was the proximate cause of the Appellant herein to sustain the permanent losses thereof, and severe, irreparable, continuous, hardships, pain and suffering, inadequate, and uncomfortable beds, etc., for which said Ap-

pellees herein persist in no financial or material restitution therefor to the Appellant herein, which is ttended by malice, and insults, and a wilful, reckless. selfish, disregard of the injured Appellant herein financially, materially and personally in her guaranteed Civil Right to the lawful ownership of her household goods and personal properties, etc., and injured feelings which are unconstitutionally violated and held invalid by the trial court in contrariness to the said applicable, pertinent Illinois, and in serious violation of the due process clauses of the Fifth and Fourteenth Amendments to the Constitution of the United States.

That the trial court judge wilfully, maliciously, wrongfully, and prejudiciously committed an abuse of judicial discretion in his disagreement with the legal definition of "Conversion" in his application and interpretation of the said Appellees herein wilful, malicious, conspiratorial, unconstitutional, wrongful, unlawful, criminal conversion over the Appellant's household goods and personal properties, etc., to-wit: "An unauthorized assumption and exercise of the right of ownership over goods or personal chattels belonging to another, to the alteration of their condition or the exclusion of the owner's rights. Any unauthorized act which deprives an owner of his property permanently or for an indefinite time. Unauthorized any wrongful exercise of dominion and control over another's personal property, to exclusion of or inconsistent with rights of owner." (Blacks Law Dictionary, Special Deluxe Fifth Edition, West, 1979, page 300)

That on or before August 22, 1977, said Appellees herein wilfully, maliciously, conspiratorially, and

criminally converged over the Appellant's household goods and personal properties, etc., and sold them without any form of notice in writing or by newspaper publication to the Appellant herein, in serious violation and noncompliance with statutory requirements governing said sale and financial proceeds therefrom, over which said Appellees herein acquired no legal rights thereto except the right and obligation of safekeeping of the Appellant's said household goods and personal properties, etc., and legal storage fees therefor only.

That prior to the commencement of this cause of action on September 15, 1977, at said Appellees' COMMUNITY CRISIS CENTER, 600 Margaret Place, Elgin, Illinois,an Inn, to claim her household goods and personal properties, etc., subsequent to numerous long distance telephone calls from Chicago, Illinois, to Appellee MARY BERG, et al., regarding the moving of her household goods and personal properties, etc., from their private warehouse storage and safekeeping (Lederer v. Railway Terminal & Warehouse Co., 1931, 178 N.E. 394, 346 Ill. 140, 77 A.L.R. 1497; Piersol v. Bendum Trees Oil Co., et al., 2 F.R.D. 133) of said Appellees' COMMUNITY CRISIS CENTER, an Inn, and when the movers would be available to move the same therefrom to Chicago, Illinois. Appellee MARY BERG, verbally assured and informed the Appellant herein each time she telephoned her that her household goods and personal properties, etc., were stored in her private warehouse storage in the premises of said Appellees' COMMUNITY CRISIS CENTER, an Inn, in safekeeping and storage, except "the desk and chair I sold them, I will give you the money!" And the Appellant herein asked, "Where are my papers and books from the drawers?" Appellee MARY BERG said, "I put them into a box and stored them in the

attic; call me the day before you come for your other property and I will bring them down." Thereafter, the Appellant BEATRICE L. ROBINSON, telephoned said Appellees herein constantly prior to the day before she same or went for her household goods and personal properties, etc., and said Appellees MARY BERG, et al., never gave the Appellant herein the said papers and books from the drawers of the desk, nor the money from the sale thereof to date.

That on September 15, 1977, the Appellant herein BEATRICE L. ROBINSON, hired movers, three (3) male adults, and rented a nine-foot trailer in Chicago, Illinois, required to move the Appellant's household goods and personal properties, etc., from said Appellees's COMMUNITY CRISIS CENTER, 600 Margaret Place, Elgin, Illinois, an Inn, to Chicago, Illinois. The Appellant herein and the three (3) male adult movers received from said Appellees herein of her household goods and personal properties, etc., from said Appellees' COMMUNITY CRISES CENTER, 600 Margaret Place, Elgin, Illinois, an Inn, the following: 1 Stereo with 2 speakers; 1 console Television; 2 medium size luggages; 1 train case; 1 LP Record; 1-45 rpm record, in that move to Chicago, Illinois (See Appendix "A" Warehouse Receipt for the balance of the Appellant BEATRICE L. ROBINSON'S household goods and personal properties, etc., not received or returned to her by said Appellees MARY BERG; GRETCHEN VAPNAR) Said Appellee MARY BERG, then and there promised the Appellant BEATRICE L. ROBINSON, that she would be able to get her missing household goods and personal properties, etc., when she would have time to permit her to do so. That the Appellant herein returned to said Appellees' COMMUNITY CRISIS CENTER, 600 Margaret Place, Elgin, Illinois, an Inn, on Sep-

tember 20, 1977, for the remainder of her household goods and personal properties, etc., and received from said Appellee MARY BERG, et al., nothing. On September 26, 1977, the Appellant BEATRICE L. ROBINSON, returned again to said Appellees' COMMUNITY CRISIS CENTER, 600 Margaret Place, Elgin, Illinois, an Inn, for the remainder of her household goods and personal properties, etc., and received from said Appellees MARY BERG, et al., the following: 12 books; 2 LP records; 2 photographs; several loose plastic flowers. On September 27, 1977, the Appellant herein returned again to said Appellees' COMMUNITY CRISIS CENTER, 600 Margaret Place, Elgin, Illinois, an Inn, for the remainder of her household goods and personal properties, etc., and received from Appellee MARY BERG; GRETCHEN VAPNAR, the following: 1 Olivetti Studio 44 Portable Typewriter (with broken metal carriage return). Further the Appellant herein has received nothing more of her household goods and personal properties, etc., nor monetary compensation in damages therefor to date from said Appellees herein. Lederer v. Railway Terminal & Warehouse Co., 1931, 178 N.E. 394, 346 Ill. 140, 77 A.L.R. 1497; Piersol v. Bendum Trees Oil Co., et al., 2 F.R.D. 133; Sering v. Shafroth, 137 Ill. 393, 27 N.E. 702.

That said Appellees MARY BERG; GRETCHEN VAPNAR, wilfully, maliciously, conspiratorially, unconstitutionally, wrongfully, criminally, and unlawfully converged over and deprived the Appellant BEATRICE L.ROBINSON, of her household goods and personal properties, etc., without any written, verbal or printed notice in any newspaper, in the State of Illinois as required by law, published in the County wherein such sale was made thereof, and retained all cash money proceeds received for said household goods and personal properties,

etc., owned and belonging to the Appellant herein, in excess of $30,000.00, above and beyond legal charges for storage and safekeeping, plus legal interest thereon due and oweing to the Appellant herein, pursuant to the applicable, pertinent Illinois law.

That the trial court judge wilfully, maliciously, conspiratorially, wrongfully, unconstitutionally and unlawfully against the manifest weight of the true, factual evidence adduced in documentary Warehouse Receipt Inventory, Appendix and in testimony by the Appellant herein to the court, he rendered a verdict for said Appellees with prejudice against the Appellant herein clearly and unequivocally in an abuse of judicial discretion in open court, in contrariness to the said applicable, pertinent, Illinois Law governing the sale of unclaimed property by carrier or warehouseman, exceeding his power.

The Appellant BEATRICE L. ROBINSON, is lawfully entitled to receive monetary restitution for the loss of her household goods and personal properties, etc., from said Appellees in excess of $30,000.00, plus costs and legal interest thereon, the measure of compensatory damages on the Appellant's undamaged household goods and personal properties, etc., at their fair market value at the time of said Appellees conversion of the Appellant's undamaged household goods and personal properties, etc., as they appear and the applicable, costs thereof on the Inventory (Appendix "A" -Warehouse Receipt) in addition to monetary damages in the aggregate sum of $30,000.00, in punitive, exemplary, vindictive and special damages sustained by the Appellant herein in efforts to recover her household goods and personal properties, etc., or compensation therefor

from said Appellees MARY BERG; GRETCHEN VAPNAR, et al., in satisfaction of Chapter 14, Section 3, Illinois Revised Statutes, as amended, to-wit: "...(A)nd out of the proceeds of such sale to pay all legal charge on such articles, and the overplus, if any, shall be paid to the owner...upon demand." Further, in satisfaction of the Fifth Amendment to the constitution of the United States, to-wit: "(N)or shall private property be taken for public use, without just compensation. Further in satisfaction of the Fourteenth Amendment to the Constitution of the United States, to-wit: "...(N)or shall any State deprive any person ... property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws." Further, in satisfaction of Article 1, Section 15, Constitution of Illinois, to-wit: "Private property shall not be taken or damaged for public use without just compensation as provided by law." Further in satisfaction of Chapter 111-2/3, Section 121, Smith-Hurd Illinois Annotated Statutes, to-wit: "All rules and regulations made by an operator affecting or pertaining to storage shall be just and reasonable." And that "No operator shall merge storage charges into transfer or other charges. Such operator shall render to one person or persons storing the property, a statement or bill listing storage charges separately, upon request." Lederer v. Railway Terminal & Warehouse Co., 1931, 178 N.E. 394, 346 Ill. 140, 77 A.L.R. 1497; Sering v. Shafroth, 137 Ill. 393, 27 N.E. 702.

FEDERAL QUESTIONS ARE SUBSTANTIAL

The questions presented herein are predicated

upon the following grounds: (1) The wilful, malicious, conspiratorial, unconstitutional, wrongful, criminal and unlawful deprivation of her household goods and personal properties, etc., and (2) due process and (3) equal protection of the pertinent, applicable, Illinois laws governing the unlawful conversion, and sale of the Appellant BEATRICE L. ROBINSON'S household goods and personal properties, etc., by Appellees MARY BERG; GRETCHEN VAPNAR, from their private warehouse storage and safekeeping in their COMMUNITY CRISIS CENTER, 600 Margaret Place, Elgin, Illinois, an Inn, without any form of compensation paid to the Appellant herein therefor to date, in serious violation of the provisions of the Fifth and Fourteenth Amendments to the Constitution of the United States, and invalidating the provisions of 8 Am. Jur. 2d Bailments, Secs, 31, 33; 18 Am. Jur. 2d Conversion, Section 1, where the Bailor had right to immediate possession, the Bailee may not hold the property against the rights of the true owner. The Bailee's unqualified refusal constitutes a conversion of the property. Schaefer v. Washington Safety Deposit Co., 281 Ill. 43, 117 N.E. 781; Wetherell v. O'Brien, 140 Ill. 146, 29 N.E. 904. Which said unconstitutional and unlawful violations were wilfully, maliciously, conspiratorially, wrongfully, and prejudiciously affirmed by the trial court, the Appellate Court of Illinois, Second Judicial District, and by the Supreme Court of Illinois on March 31, 1982.

The questions presented herein are substantial to due process in behalf of the Appellant herein, so that it may be had to remedy the unconstitutional injuries inflicted upon the Appellant herein by Appellees herein by reason of

their wilful, malicious, conspiratorial, unconstitutional, wrongful, criminal and unlawful deprivation of her household goods and personal properties, etc., and unlawful deprivation of her household goods and personal properties, etc., and due process and equal protection of the pertinent, applicable, Illinois laws governing the unlawful conversion, and sale of the Appellant BEATRICE L. ROBINSON'S household goods and personal properties, etc., by Appellees MARY BERG; GRETCHEN VAPNAR, from their private warehouse storage and safekeeping in their COMMUNITY CRISIS CENTER, 600 Margaret Place, Elgin, Illinois, an Inn, without any form of compensation paid to the Appellant herein therefor to date, and prior to their refusal and failure to notify the Appellant herein of said sale thereof, either by mail, or by newspaper publication in any newspaper, or by postoffice method, pursuant to and in satisfaction of the provisions of Chapter 14, Section 3, Illinois Revised Statutes, as amended. Sering v. Shafroth, 137 Ill. 393, 27 N.E. 702.

Further, No. 2 question presented for review by this Court is substantial, and relates a denial of equal protection to the Appellant herein by the trial court in serious violation of the Fourteenth Amendment to the Constitution of the United States and of Rule 53, of the Supreme Court of the United States, in furtherance of an overt denial of due process of the pertinent, applicable, Illinois laws and of the United States of America to this cause of action in favor of the Appellees herein, contrary thereto, defeating and holding the same invalid, as to the Appellant herein in State action. And holding invalid Illinois Supreme Court Rule 298, etc.

CONCLUSION

The Appellant herein submits that this Appeal brings before the court substantial federal questions which require plenary consideration, with briefs on the merits and oral argument, for their resolution.

Beatrice L. Robinson

Appellant
P. O. Box 87414
Chicago, Illinois 60680

(Appendices)

UNITED STATES OF AMERICA)
) SS.:
FOR THE DISTRICT OF COLUMBIA) SWORN STATEMENT

BEATRICE L. ROBINSON, being first duly sworn on her oath deposes and states she has read the foregoing Jurisdictional Statement by her subscribe; that the same is true in substance and in fact.

Beatrice L. Robinson

SUBSCRIBED and SWORN to before me this 11 day of June, 1982.

Edward B. Faircloth

Notary Public
My Commision Expires
August 14, 1982

Name: BEATRICE L. ROBINSON

Attorney for: Appellant

Address: P. O. Box 87414

City: Chicago, Illinois 60680

STATE OF ILLINOIS

OFFICE OF

CLERK OF THE SUPREME COURT

SPRINGFIELD

62706

H. Wayne Russell
CLERK

April 1, 1982

TELEPHONE
AREA CODE 217
782-2035

Ms. Beatrice L. Robinson
P.O. Box 87414
Chicago, IL 60680

In re: Beatrice L. Robinson, petitioner, vs. Mary Berg, et al., respondents. No. 7008.

Dear Ms. Robinson:

On March 31, 1982, the Supreme Court made the following announcement concerning the above entitled cause:

> The portion of the motion by petitioner for leave to file a petition for leave to appeal instanter is denied. The part of the motion for leave to sue as a poor person is allowed.

Very truly yours,

Clerk of the Supreme Court

HWR:rk

Not Reported.

APPENDIX "C"

Circuit Court of Kane County

16th Judicial Circuit, State of Illinois, County of Kane
Court House, Geneva, IL 60134
Telephone (312) 232-6356

HON. JAN CARLSON
Circuit Court Clerk

BARBARA J. CLELAND
Chief Deputy Clerk

STAFF ASSISTANTS
Charles Johnson
Mark Meyer

ADMINISTRATIVE SECRETARY
Donna McClellan

DIVISION SUPERVISORS
Christine King, Civil Division
Lidia Reyes, Traffic/Crim. Div.
Scott Brundige, Courtroom Clerks
Sonja Sickler, Child Support
Cecelia Hackman, Data Processing
Ilse Rohwer, General Services

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SUPREME COURT, U.S.

July 9, 1982

Margaret H. McFarland
Asst. Clerk
Office of the Clerk
Supreme Court of the United States
Washington, IL 60543

Re: Beatrice L. Robinson
vs
Community Crisis Center, Elgin, Illinois
General No. 79L3744 - Appeal No. 79-777

Dear Ms. McFarland,

On July 8th, I received a telephone call from Beatrice L. Robinson requesting we send to you a copy of Judge Krause order of December 4, 1979. Since we do not have the file with the original documents we are sending a copy of a copy of the order. Therefore, it has not been certified.

On May 27, 1982 I requested the Illinois Supreme Court forward the file with the original documents to your court. Most likely you do have it by now.

Please advise if there is anything further we might do to help you.

Yours truly,

Edna M. Yeck
Appeals Clerk

16TH JUDICIAL CIRCUIT
KANE COUNTY, ILLINOIS

CIRCUIT COURT FOR THE 16TH JUDICIAL CIRCUIT

STATE OF ILLINOIS } SS.
COUNTY OF KANE }

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IN THE CIRCUIT COURT
DEC - 4 1979
Clerk of the Circuit Court

GEN. NO. 79 L - 3744

☐ JURY ☐ NON-JURY

Robinson

VS.

Berg et al.

PLAINTIFF (S)

DEFENDANT (S)

JUDGE Krause	COURT REPORTER	PLTF. ATTY. ~~Gelfius~~ Pro Se	4
DEPUTY CLERK	A copy of this order has been sent to:	CHECK IF PRESENT DEFT. ATTY. Golden	4

ORDER

This cause coming on before this court for trial of this cause and this court having heard the Plaintiffs evidence and testimony and the ~~the~~ after the plaintiff rested her case and on motion of the defendant for dismissal of the ~~P~~ case and this court having proper jurisdiction of the subject matter herein;

It is Hereby Ordered:
this case is dismissed
with prejudice.

12/3/79

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IN THE CIRCUIT COURT FOR THE SIXTEENTH JUDICIAL CIRCUIT
KANE COUNTY, ILLINOIS

BEATRICE L. ROBINSON,

Plaintiff,

v.

MARY BERG; GRETCHEN VAPNAR; COMMUNITY CRISIS CENTER, 600 MARGARET PLACE, ELGIN, ILLINOIS,

Defendants.

Appeal From The Circuit Court For The Sixteenth Judicial Circuit Kane County, Illinois

Judge John Krause, Presiding
(79 L 3744)

FILED
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CIRCUIT COURT CLERK
KANE CO. ILL.

NOTICE OF APPEAL TO THE SUPREME COURT OF THE UNITED STATES

To: Clerk, The Circuit Court For The Sixteenth Judicial Circuit, Kane County Illinois
Kane County Courthouse
Geneva, Illinois

I. Notice is hereby given that BEATRICE L. ROBINSON, the Plaintiff above-named, hereby appeals to the Supreme Court of the United States, from the final order entered in this action on March 31, 1982 in the Supreme Court of Illinois.

This appeal is taken pursuant to 28 U.S.C. Sec. 1257(2).

II. The Clerk will please prepare a transcript of the record in this cause for transmission to the Clerk of the Supreme Court of the United States, and include in said transcript the following:

1. Plaintiff's Complaint.
2. Plaintiff's Inventory of Household Goods, etc.
3. Transcript of Proceedings of Trial.
4. Judge John Krause's order dismissing the case.
5. The Appellant Court of Illinois, Second Judicial District's decision and order dismissing the appeal.
6. The Supreme Court of Illinois letter dated April 1, 1982, denying the Plaintiff's Petition For Leave To Appeal, on March 31, 1982.
7. The Supreme Court of Illinois letter dated April 1, 1982, denying the Plaintiff's Motion To File A Petition For Writ Of Mandamus, on March 31, 1982.

III. The following questions are presented by this appeal:

1. Was it lawful for presiding Judge John Krause to dismiss this cause of action before allowing the Plaintiff time to present in competent evidence the depreciation price list of the converged household goods, etc., before the court?

2. Was it lawful for the trial court to deny the Plaintiff a copy of the Report of Proceedings of the trial in forma pauperis?

(Signed) Beatrice L. Robinson
Appellant

STATE OF ILLINOIS)
) SS.:
COUNTY OF COOK)

PROOF OF SERVICE

I, BEATRICE L. ROBINSON, Appellant herein hereby certifies that on the 15th day of April, 1982, I served a copy of the foregoing Notice of Appeal to the Supreme Court of the United States on the several parties thereto, as follows:

On Defendants MARY BERG; GRETCHEN VAPNAR; COMMUNITY CRISIS CENTER, 600 MARGARET PLACE, ELGIN, ILLINOIS, by mailing a copy in a duly addressed envelope with first class postage prepaid to Schwartz & Golden, 718 Willow Lane, W. Dundee, Illinois 60118.

(Signed) Beatrice L. Robinson
Appellant

SUBSCRIBED and SWORN to
before me this 15 day of
April 15, 1982.

Vernon L. Burke
Notary Public

FILED
APR 15 11 59 AM '82
CIRCUIT COURT CLERK
KANE CO., ILL.

Name: BEATRICE L. ROBINSON
Attorney for: Plaintiff
Address: P. O. Box 87414
City: Chicago, Illinois 60680